

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,  
*Plaintiff,*

vs.

EDSEL TORRES CANCEL  
*Defendant.*

CASE NO.: 21-041 (RAM)

**MOTION FOR CHANGE OF PLEA**

TO THE HONORABLE COURT  
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO:

**COMES NOW**, the defendant, represented by and through the undersigned attorney, states and prays as follows:

1. After careful consideration and consulting with counsel, the defendant moves this Honorable Court for a Change of Plea Hearing.

**WHEREFORE**, the defendant respectfully requests that this Honorable Court take notice of the information contained herein and schedule a Change of Plea hearing.

**I HEREBY CERTIFY** that on this date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all the parties of record.

**RESPECTFULLY SUBMITTED,**

In San Juan, Puerto Rico, August 8, 2022.

*S/Giovanni J. Canino*  
Giovanni J. Canino  
Bar No. 225503  
PO Box 6688  
San Juan, PR 00914  
gcanino@gmail.com